

STATE OF NORTH DAKOTA )  
 ) SS  
COUNTY OF CASS )

I, Geoffrey Bakken, being duly sworn, depose and state as follows:

1. I have worked as a Deputy for the Clay County Sheriff's Office in Moorhead, MN since 2013, and am a licensed Peace Officer in the State of Minnesota. I have been a Detective assigned to the Narcotics division since February of 2019. I was assigned to work as a Task Force Officer (TFO) with the Drug Enforcement Administration (DEA) in Fargo, ND from February 2019 to October of 2021. I have been assigned as Postal Inspector Task Force Officer (TFO) with the United States Postal Inspection Service (USPIS) since May 2022 and have completed a 24-hour USPIS orientation course. I am currently assigned to a narcotics assignment, located at the Fargo, ND office of the Denver Division. As part of my duties as a U.S. Postal Inspector TFO, I investigate the use of the U.S. Mails to illegally send and receive controlled substances and drug trafficking instrumentalities. As part of this assignment, I received formal training from the USPIS and training through contact with experts from various law enforcement agencies. I have received training in the enforcement of laws, and the identification of packages with characteristics indicative of criminal activity. I have conducted and participated in criminal investigations utilizing the normal methods of investigation.
2. Since the affidavit is being submitted for the limited purpose of supporting a package search warrant, I have not included each and every fact known concerning this investigation. I have set forth only the facts believed necessary to establish probable cause to search said packages. Where statements of others are set forth in this affidavit, they are set forth in substance and are not verbatim. The information contained in this affidavit is based on my personal observations and experience, in addition to information obtained by other law enforcement agents, witnesses and documents.
3. Beginning on or about July 15, 2024, USPIS Fargo personnel began receiving information from the Southwest Narcotics Task Force (SWNTF) in Dickinson, ND as well as Postal

Inspectors in Florida. The information provided indicated multiple individuals in Dickinson, ND were using addresses to receive shipments of controlled substances from Florida and California and that a future shipment would be arriving in Dickinson, ND in the next few days. As part of the SWNTF investigation, USPIS Fargo personnel learned they had conducted purchases of methamphetamine from the individuals.

4. On July 17, 2024, USPIS personnel received additional information from Postal Inspectors in Florida who advised they had identified several shippers/sources of controlled substances as part of an ongoing Florida/California investigation that they have seized and found to contain methamphetamine.
5. On July 18, 2024, TFO Justin Phillips (TFO Phillips) applied for a Federal search warrant in the District of North Dakota for a package related to this ongoing narcotics investigation. The package was from "Rodrigo Lopez 6325 Calle Pabana SAN DIEGO CA 92139" and addressed to "Tiffany Mills 951 6th St West DICKINSON, ND 58601". TFO Phillips was granted Federal search warrant (3:24-mj-465) to open this package. At conclusion of this search warrant, TFO Phillips found the package contained approximately 1,832 grams (4 pounds) of suspected methamphetamine. The suspected methamphetamine was field tested and showed the presence of methamphetamine.
6. On July 23, 2024, USPIS Inspector Thomas Irvin applied for and was granted two Federal search warrants for the residences of 951 6<sup>TH</sup> ST W., Dickinson, ND (warrant # 1:24-MJ-472) and 227 10<sup>TH</sup> Avenue E., Dickinson, ND (warrant #1:24-mj-471).
7. On July 24, 2024, Inspector Irvin and other law enforcement agents executed the above referenced residential Federal search warrants. During the execution of these search warrants, agents detained the suspected recipient of the package seized on July 18, 2024, by TFO Phillips which contained methamphetamine. This individual agreed to cooperate with investigators and will be referred to in this affidavit as confidential informant 2306 (CI2306).

8. On July 29, 2024, agents met with CI2306 to conduct a recorded debrief pertaining to CI2306's source-of-supply, later identified as "Ramon Martinez" (Ramon). CI2306 conducted multiple recorded phone calls with Ramon in attempt to facilitate a controlled purchase of methamphetamine.
9. During the recorded text messages and phone calls between CI2306 and Ramon, Ramon agreed to send CI2306 four pounds of methamphetamine through the US Mail. Ramon requested CI2306 send Ramon the funds for the purchase of the methamphetamines to Ramon's CashApp "\$ramon6210".
10. On July 30, 2024, law enforcement agents used a CashApp account "\$wastedxyouth" to send Ramon \$3,700 of recorded buy funds to CashApp account "\$ramon6210". Ramon responded that he received the \$3,700, and said via text message "Ya fam I go ima send them out first thing tomorrow they brining me those at 3".
11. On July 31, 2024, Ramon texted "yo yo wat the name for that address fam". Agents responded via the Callyo app "Travis Close". Ramon responded after saying "ok", "Yo fam that address the 7th is spelled out right cause my boy is saying that's how it is coming out on the computer". Agents responded, "Yea 45 7th avenue w Dickinson ND 58601 is good". Ramon then sent a picture via text showing a postal receipt with tracking number 9481711206210603812080 and displayed a ship to address of "Travis Close 45 7TH Ave W Dickenson, ND 58601".
12. On July 31, 2024, the controlled purchase package was placed into the mail-stream from National City, CA 91950. The controlled purchase package displays tracking number 9481711206210603812080, weighs 11 pounds and has \$92.52 in US Postage affixed.
13. On August 2, 2024, the controlled purchase package arrived at the Downtown Fargo Post Office for further processing. On the same date, Inspection Service personnel went to the Downtown Fargo Post Office and visually and physically inspected the controlled purchase package. The controlled purchase package displayed tracking number 9481711206210603812080, weighs 11 pounds and has \$92.52 in US Postage affixed. The Package is from "RODRIGO LOPEZ 6325 CALLE PABANA SAN DIEGO CA

92139” and addressed to “TRAVIS CLOSE 45 7<sup>TH</sup> AVE W DICKINSON ND 58601”.  
**(Agent Notes: The sender name and address for the controlled purchase package was found to be the same as the package TFO Phillips seized that contained approximately 4 pounds of methamphetamine. Furthermore, the name “Travis Close” is the undercover alias utilized by law enforcement in this case. Lastly the recipient address “45 7<sup>TH</sup> Ave W Dickinson ND 58601” is the address supplied to Ramon for the controlled purchase of methamphetamine through the use of CI2306.)**

14. On August 2, 2024, Inspection Service personnel applied and were granted Federal search warrant 3:24-MJ-484 in the District of North Dakota, signed by the Honorable Alice Senechal. On the same day TFO Chris Holte executed the search warrant on the above-mentioned controlled purchase package and found it contained approximately 1,963 gross grams of suspected methamphetamine.
15. On August 2, 2024, agents and/or CI2306 texted Ramon and confirmed that CI2306 had received the package of methamphetamine. Ramon responded that he just saw that from the tracking of this package. Inspection Service personnel reviewed USPS records and found multiple inquires of the controlled delivery package in USPS records.
16. Moving forward, agents and/or CI2306 continued communications with Ramon to purchase a second package of methamphetamine from Ramon. Ramon requested CI2306 send additional US Currency to Ramon for the second controlled purchase of methamphetamine. Agents arranged to send an additional \$3,700 to Ramon for the second controlled purchase of methamphetamine.
17. On August 7, 2024, Ramon texted photos of the tracking number (9481711206210656002735), for the second controlled purchase package confirming Ramon had sent this package. It should be noted, agents provided Ramon the same recipient’s name and address as the first controlled purchase package (Travis Close 45 7<sup>TH</sup> AVE W Dickinson, ND 58601) to send the second controlled purchase package to.

18. On August 7, 2024, the second controlled purchase package was placed into the mail-stream from Bonita, CA 91902. The second controlled purchase package displays tracking number 9481711206210656002735, weighs 10 pounds and 15 ounces and has \$104.71 in US Postage affixed.
19. On August 9, 2024, the second controlled purchase package arrived at the Downtown Fargo Post Office for further processing. On the same date, Inspection Service personnel went to the Downtown Fargo Post Office and visually and physically inspected the controlled purchase package. The second controlled purchase package displays tracking number 9481711206210656002735, weighs 10 pounds and 15 ounces and has \$104.71 in US Postage affixed. The Package is from **“ROBERTO LOPEZ 6289 POTOMAC ST SAN DIEGO CA 92139”** and addressed to **“TRAVIS CLOSE 45 7TH AVE W DICKINSON ND 58601”**.
20. On August 9, 2024, TFO Chris Holte applied for and was granted a Federal search warrant 3:24-MJ-502 in the District of North Dakota, signed by the Honorable Alice Senechal. On the same day TFO Holte executed the search warrant on the above-mentioned controlled purchase package, and found it contained approximately 1,842 gross grams of suspected methamphetamine.
21. At the direction and control of investigators, CI2306 continued communications with Martinez and arranged for an additional purchase of approximately four (4) pounds of methamphetamine for \$3,700. On August 30, 2024, investigators sent \$3,700 to Martinez via CashApp. Through monitored and recorded text messages, Martinez confirmed receipt of the money and indicated the package would be shipped on Tuesday, September 3, 2024. On September 3, 2024, Martinez sent a text message to CI2306 with a picture showing USPS Priority Mail Express package 9481711899561893417849 was shipped to the addresses and address previously provided by investigators, and identical to the previously arranged controlled purchases mailed to investigators.
22. On September 3, 2024, the third controlled purchase package was placed into the mail-stream from National City, CA 91950. The third controlled purchase package displays

tracking number 9481711899561893417849, weighs 11 pounds and has \$103.95 in US Postage affixed.

23. On September 6, 2024, the third controlled purchase package arrived at the Downtown Fargo Post Office for further processing. On the same date, Inspection Service personnel went to the Downtown Fargo Post Office and visually and physically inspected the controlled purchase package. The third controlled purchase package displays tracking number 9481711899561893 417849, weighs 11 pounds and has \$103.95 in US Postage affixed. **The Package is from “RODRIGO LOPEZ 6325 CALLE PABANA SAN DIEGO CA 92139” and addressed to “TRAVIS CLOSE 45 7TH AVE W DICKINSON ND 58601”.**

24. On September 6, 2024, TFO Chris Holte applied for and was granted a Federal search warrant 3:24-MJ-552 in the District of North Dakota, signed by the Honorable Alice Senechal. On the same day TFO Holte executed the search warrant on the above-mentioned controlled purchase package and found it contained approximately 1,733 gross grams of suspected methamphetamine.

25. At the direction and control of investigators, CI2306 continued communications with Martinez and arranged for an additional purchase of approximately four (4) pounds of methamphetamine for \$3,600. On September 26, 2024, CI sent \$3,600, at the direction and control of investigators, to Martinez via Venmo, a money transfer services mobile application.

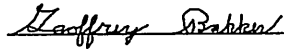
26. On October 15, 2024, Martinez sent a text message to CI2306 with a picture showing USPS Priority Mail Express bearing tracking number 9481711899561833377875 was shipped to an address previously provided by investigators, and identical to the previously arranged controlled purchases mailed to investigators.

27. On October 16, 2024, this fourth controlled purchase package arrived at the Downtown Fargo Post Office for further processing. On the same date, I visually and physically inspected the controlled purchase package. The fourth controlled purchase package

displays tracking number 9481711899561833377875. The postage is Endicia “10 LB Prime Rate” electronic postage, shows it was printed on October 15, 2024, and mailed from Zip Code 91950. The address label shows the package was mailed from **“RODRIGO LOPEZ, 6325 CALLE PABANA SAN DIEGO CA 92139” and is addressed to “TRAVIS CLOSE, 45 7TH AVE W, DICKINSON ND 58601”.**

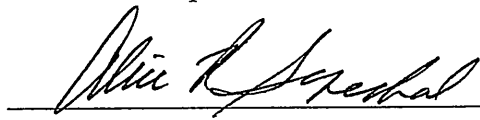
28. On November 4<sup>th</sup>, 2024, Martinez sent a text message to CI2306 with a picture showing USPS Priority Mail Express bearing tracking number 9481711899561482384873 was shipped to an address previously provided by investigators.
29. On November 6<sup>th</sup>, 2024, this fifth controlled purchase package arrived at the Downtown Fargo Post Office for further processing. On the same date, I visually and physically inspected the controlled purchase package. The fifth controlled purchase package displays tracking number 9481711899561482384873. The postage is Endicia “11 LB Prime Rate” electronic postage, shows it was printed on November 4<sup>th</sup>, 2024, and mailed from Zip Code 91950. The address label shows the package was mailed from **“RODRIGO LOPEZ, 6325 CALLE PABANA SAN DIEGO CA 92139” and is addressed to “TRAVIS CLOSE, 45 7TH AVE W, DICKINSON ND 58601”.**
30. Postal regulation section 274.31 of the USPS Administrative Support Manual states that no one may detain mail sealed against inspection, except under the following condition: A Postal Inspector acting diligently and without avoidable delay, upon reasonable suspicious, for a brief period of time, to assemble evidence sufficient to satisfy the probable cause requirement for a search warrant issued by a Federal Court. Additionally, pursuant to Section 233.1 of the Code of Federal Regulations (CFR), Postal Inspectors are authorized to accept, maintain custody of, and deliver mail.
31. Your affiant, therefore, seeks the issuance of a warrant to search this package and the contents contained therein, for controlled substances, controlled substance paraphernalia, and the proceeds relating to the sale of controlled substances, in violation of Title 21, United States Code, Sections 841 (a)(1), 843(b), and 846.

Respectfully submitted,

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Geoffrey Bakken

U.S. Postal Inspector Task Force Officer

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SWORN AND SUBSCRIBED TO BEFORE ME

THIS 6TH DAY OF NOVEMBER 2024.

UNITED STATES MAGISTRATE JUDGE